

In re: Facebook, Inc. Consumer Privacy User Profile Litigation, Case No. 3:18-MD-02843-VC**TIMELINE OF DOCUMENT PRODUCTION ISSUES RELATED TO PRIVILEGE OVERDESIGNATION**

Date	Description
Prior to Jan. 2022	Fewer than 10,000 documents logged as privileged. Weaver Decl., ¶ 10.
Jan. 28, 2022	14,132 documents total on Facebook's 3rd Categorical Privilege Log.
Mar. 17, 2022	182,112 new documents added on Facebook's 4th Categorical Privilege Log.
Apr. 22, 2022	The parties agree to a protocol for resolving disputes over Facebook's categorical privilege log (this protocol provides for sampling of certain categories of documents that Plaintiffs challenge).
Apr. 29, 2022	Plaintiffs challenge 87,094 documents on Facebook's 4th Categorical Privilege Log.
May 2, 2022	Facebook provides a statistically significant sample of documents that Plaintiffs challenged.
May 6, 2022	Facebook informs Plaintiffs that it will produce 1938 of the 3062 sampled documents in full, another 331 with redactions, and revises its claims of privilege for another 17 documents (production rate of 74%).
May 11, 2022	The parties agree that Facebook will re-review all documents on its 4th Categorical Privilege Log.
May – July 2022	Rolling lists of documents Facebook "de-designates" as privileged, production of the same documents by Facebook.
June 24, 2022	Facebook produces its 5th Amended Categorical Privilege Log, which "removes documents that Facebook determined should be removed from its 4th Categorical Privilege Log."
June 27, 2022	Facebook produces its 6th Amended Categorical Privilege Log and provides an updated list of counsel referenced in the Log.
July 21, 2022	Facebook provides a final revised cross-reference spreadsheet to Plaintiffs (allowing Plaintiffs to identify and confirm production of all de-designated documents).